

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--|---|---------------------------------------|
| U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, |) | |
| |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Civil Action No. 2:14-cv-00527 |
| |) | |
| EZEFLOW USA, INC., |) | Hon. Maureen P. Kelly |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |

MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff U.S. Equal Employment Opportunity Commission (the “Commission” or “EEOC”) respectfully moves the Court for approval and entry of the attached Consent Decree (Exhibit 1). In support of this Motion, the Commission states as follows:

1. The parties have negotiated the attached Consent Decree as a resolution of the Commission’s claims in the above-captioned case.
2. The Commission believes that the terms of this Consent Decree are adequate, fair, reasonable, equitable and just.
3. The Commission believes that the Consent Decree conforms with the Federal Rules of Civil Procedure and is not in derogation of the rights or privileges of any person. The entry of this Consent Decree will further the objectives of the Americans with Disabilities Act of 1990, as amended, and will be in the best interests of the parties, those for whom the Commission seeks relief and the public.

4. Defendant Ezeflow USA, Inc. consents to this Motion. Defendant's consent to this Motion, and entry of the proposed Consent Decree, shall not constitute or be construed as an admission by Defendant of any violation of law.

Respectfully submitted,

Date: January 8, 2015

/s/ Regina M. Andrew

Regina M. Andrew
Trial Attorney
Pa. I.D. No. 55517

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION
Baltimore Field Office
10 S. Howard Street, Suite 3000
Baltimore, MD 21201
(410) 209-2724
regina.andrew@eeoc.gov